

April 27, 2001

Mr. Wayne Davidson
Holsum of Fort Wayne
800 Boyd Boulevard
LaPorte, IN 46350

Re: **091-14213-00106**
First Administrative Amendment to
Part 70 091-7688-00106

Dear Mr. Davidson:

Holsum of Fort Wayne was issued a permit on April 16, 1999 for a bakery. A letter requesting the addition of a 5.4 MMBtu/hr natural gas fired boiler to their existing source was received on March 29, 2001. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows.

The proposed boiler is being installed to serve as a back-up to an existing boiler that keeps freshly made bread warm and warms the sugar storage area during periods of cold weather. The boiler will not generate an increase in production capacity of any other emission units at the source. Thus, the emissions generated by the proposed modification are the natural gas combustion emissions from the proposed boiler.

Based on a maximum capacity of 5.4 MMBtu/hr, natural gas combustion, emission factors obtained from EPA AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, the unrestricted potential to emit (PTE) of the worst case criteria pollutant is estimated to be 2.4 tons/yr, the worst case single hazardous air pollutant (HAP), 0.04 tons/yr, and the combined HAP, 0.04 tons/yr. The emissions are not controlled.

These emissions are less than the applicable exempt levels of 326 IAC 2-1.1-3(d)(1) and the other insignificant levels listed in 326 IAC 2-7-1(21). The proposed boiler is therefore determined to be an insignificant activity pursuant to 326 IAC 2-7-1(21).

The only new requirement that applies to the proposed boiler is 326 IAC 6-2-4, "Particulate Emission Limitations for Sources of Indirect Heating: Emission Limitations for Facilities Specified in 326 IAC 6-2-1(d)" which states that the particulate matter (PM) emissions from indirect heating units constructed after September 21, 1983, shall be limited by the following equation:

$$Pt = [1.09 / (Q)^{0.26}]$$

where: Pt = lb PM/MMBtu
 Q = total source capacity in MMBtu/hr

Based on a source heat input capacity of 8.30 MMBtu/hr, the particulate matter shall be limited to 0.63 lb/MMBtu. Utilizing the estimated unrestricted PM PTE of 0.01 lb/hr, the particulate matter emissions are estimated to be 0.002 lb PM/MMBtu which is less than the limit of 0.63 lb PM/MMBtu.

$$0.01 \text{ lb PM/hr} \times 1/5.4 \text{ hr/MMBtu} = 0.002 \text{ lb/MMBtu}$$

Thus, compliance is determined to be achieved.

Since the proposed boiler is an insignificant activity, the boiler shall be incorporated into the existing Title V permit (091-7688-00106), issued on April 16, 1999, as an administrative amendment pursuant to 326 IAC 2-7-11 because the proposed modification does not qualify for a minor permit modification under 326 IAC 2-7-10.5(e) and does not qualify for a significant permit modification under 326 IAC 2-7-10.5(f).

To incorporate the proposed boiler into the Title V permit, the following changes shall be made to the TitleV permit:

1. Condition A.3 shall be amended to include the new proposed boiler and designate an identification number to each boiler to provide a means of differentiating between the two.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Six (6) flour silos, each having a capacity of 150,000 lbs, with a baghouse used for control and to equalize pressure. Venting inside the building.
- (b) One (1) **2.9 MMBtu/hr natural gas fired boiler, fueled by natural gas, with a maximum heat capacity of 2.9 MMBtu/hr, identified as B1.**

(c) One (1) 5.4 MMBtu/hr natural gas fired boiler, identified as B2.

2. The facility description of Section D.3 shall be amended to include the new proposed boiler and designate an identification number to each boiler to provide a means of differentiating between the two.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activity

- (da) One (1) **2.9 MMBtu/hr natural gas fired boiler, fueled by natural gas, with a maximum heat capacity of 2.9 MMBtu/hr, identified as B1.**
- (b) **One (1) 5.4 MMBtu/hr natural gas fired boiler, identified as B2.**

3. Condition D.3.1 shall be amended to include the new identification number for the existing boiler (B1) and to update the limitation.

D.3.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-3 (e) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), **the particulate emissions from Boiler B1 from all facilities used for indirect heating purposes which were existing and in operation on or after June 8, 1972, shall not in no case exceed 0.6 pounds of particulate matter per million British thermal units heat input.**

~~This limitation is based on the following equation: $Pt = (50)(0.67)(51) / (76.5)(2.9)^{0.75}(1)^{0.25}$~~

~~Where: Pt = Pounds of particulate matter emitted per million Btu heat input.~~

~~Q = Total source maximum operating capacity rating in million Btu per hour heat input.~~

4. A new Condition D.3.2 shall be added to include the applicable 326 IAC 6-2-4 limit of the proposed boiler (B2), existing Condition D.3.2 shall be amended to reflect both the existing and new boilers (B1 and B2), and existing Condition D.3.2 shall be renumbered to Condition D.3.3.

D.3.2 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-4 (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1(d)), the particulate matter (PM) emissions from Boiler B2 shall be limited to 0.63 pounds of particulate matter per million British thermal units heat input.

D.3.23 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test ~~this facility~~ **boilers B1 and B2 by this permit at this time.** However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limits specified in Conditions **D.3.1 and D.3.2** shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

SDF Initials

cc: File - LaPorte County

U.S. EPA, Region V

LaPorte County Health Department

Northwest Regional Office

Air Compliance Section Inspector - Rick Massoels

Compliance Data Section - Karen Nowak

Administrative and Development - Janet Mobley

Technical Support and Modeling - Michele Boner

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR QUALITY**

**Holsum of Fort Wayne, Inc.
800 Boyd Boulevard
LaPorte, Indiana 46350**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T091-7688-00106	Date Issued: April 16, 1999
First Administrative Amendment No.: 091-14213-00106	Affected Pages: 4 and 29
Original signed by Paul Dubenetzky Issued by: Paul Dubenetzky, Branch Chief, Office of Air Quality	Issuance Date: April 27, 2001

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates stationary

Responsible Official:	Wayne Davidson
Source Address:	800 Boyd Boulevard, LaPorte, Indiana 46350
Mailing Address:	800 Boyd Boulevard, LaPorte, Indiana 46350
SIC Code:	2051
County Location:	LaPorte
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program
	Minor Source, under PSD
	Minor Source, Section 112

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) baking oven, fueled by natural gas, identified as Bun Oven with a maximum heat capacity 3.055 MMBtu/hr and combined maximum production of 20,525 lb/hr of bread and buns, exhausting to stacks 1 and 2.
- (b) One (1) baking oven, fueled by natural gas, identified as Bread Oven with a maximum heat capacity 4.875 MMBtu/hr and combined maximum production of 20,525 lb/hr of bread and buns, exhausting to stacks 3 and 4.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Six (6) flour silos, each having a capacity of 150,000 lbs, with a baghouse used for control and to equalize pressure. Venting inside the building.
- (b) One (1) 2.9 MMBtu/hr natural gas fired boiler, identified as B1.
- (c) One (1) 5.4 MMBtu/hr natural gas fired boiler, identified as B2.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

Holsum of Fort Wayne, Inc.
LaPorte, Indiana
Permit Reviewer: Peggy Zukas

First Administrative Amendment: 091-14213-00106
Amended By: SDF

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SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activity

- (a) One (1) 2.9 MMBtu/hr natural gas fired boiler, identified as B1.
- (b) One (1) 5.4 MMBtu/hr natural gas fired boiler, identified as B2.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-3 (e) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), the particulate emissions from Boiler B1 shall not exceed 0.6 pounds of particulate matter per million British thermal units heat input.

D.3.2 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-4 (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1(d)), the particulate matter (PM) emissions from Boiler B2 shall be limited to 0.63 pounds of particulate matter per million British thermal units heat input.

D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test boilers B1 and B2 at this time. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limits specified in Conditions D.3.1 and D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.